

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

In re:

Chapter: 13

Todd H. Lasanske and Dawn M. Lasanske

Case No. 15-26946-beh

Debtors.

AFFIDAVIT SUPPORTING MOTION FOR RELIEF FROM AUTOMATIC STAY

STATE OF Kentucky)

) ss.

COUNTY OF Boone)

Before me, the undersigned authority, personally appeared the person identified below, who being by me duly sworn, deposed as follows:

1. My name is Lawanda Chambliss. I am of sound mind, lawful age and capable of making this Affidavit. The statements set forth in this Affidavit are true and correct based on my personal knowledge and review of the business records described herein.
2. This Affidavit is submitted in support of the motion seeking relief from the automatic stay (the "Motion") by CitiMortgage, Inc., successor by merger to ABN AMRO Mortgage Group, Inc., its Successors and/or Assigns ("Movant"), in the above-captioned case.
3. I am employed by CitiMortgage, Inc. as a Vice President - Document Control. In that capacity, I am familiar with the books of account and have examined all books, records, and documents kept concerning the transaction alleged in the Motion. All of these books, records, and documents are kept in the regular course of business and are made at or near the time of the transaction using information transmitted by persons with personal knowledge of the facts. It is the regular practice to make and keep these books, records and documents. All of these books, records, and documents are managed by employees or agents whose duty it is to keep the books, records, and documents accurately and completely.
4. My responsibilities include, but are not limited to, handling bankruptcy accounts and ascertaining amounts due and payable.

5. I have personal knowledge of the facts contained in this Affidavit. Specifically, I have reviewed and have personal knowledge of the records related to the loan account associated with the certain property described as W150 N 7952 Menomonee Manor, V of Menomonee Falls, WI 53051.
6. Movant is the current holder of the Mortgage. A true and correct copy of the Mortgage is attached hereto as Exhibit B and incorporated herein by reference. A true and correct copy of the assignment of the Mortgage is attached hereto as Exhibit C and incorporated herein by reference.
7. Movant is the current holder of the note. A true and correct copy of the note is attached hereto as Exhibit A, and incorporated herein by reference.
8. A true and correct copy of the Merger Documents are attached hereto as Exhibit D and incorporated herein by reference
9. As of July 6, 2016, there are one or more defaults in paying Debtor(s) post-petition amounts due with respect to the note.
10. As of the date hereof, the principal balance owed by the Debtor(s) to CitiMortgage, Inc. is \$124,702.08, plus advances made, attorney fees, costs, other fees and charges, and interest accruing thereon in accordance with the loan documents.
11. The following chart sets forth those postpetition payments, due pursuant to the terms of the note, that have been missed by the Debtor(s) as of July 6, 2016:

Number of Missed Payments	From	To	Missed Principal and Interest	Missed Escrow (if applicable)	Monthly Payment Amount	Total Amounts Missed
3	5/1/16	7/1/16	\$946.47	\$444.05	\$1,390.52	\$4,171.56
Less postpetition partial payments (suspense balance):						(\$1,233.78)

Total: \$2,937.78

12. As of July 6, 2016, the total postpetition arrearage/delinquency is \$2,937.78, consisting of (i) the foregoing total of missed postpetition payments in the amount of \$2,937.78, plus (ii) the following postpetition fees¹:

Description	Amount
N/A	\$0.00

13. Attached hereto as Exhibit E and incorporated herein by reference is a summary of the post-petition mortgage payment history since the post-petition mortgage payments were last current.
14. As of the date hereof, the total debt owed by the Debtor(s) to CitiMortgage, Inc. is \$128,347.05.

I solemnly affirm under the penalty of perjury and upon personal knowledge that the contents of the foregoing paper are true.

EXECUTED on August 23, 2016.

By: Lawanda Chambliss
Name: Lawanda Chambliss
Title: Vice President-Documents Control

STATE OF Kentucky)
) ss.
COUNTY OF Boone)

Subscribed and sworn to me the undersigned authority on this 23 day of August, 2016.

My Commission Expires: 10-17-2016

DEBORA LAWSON
Notary Public, ID No. 476837
State at Large, Kentucky
Commission Expires October 17, 2016

Debora Lawson
Notary Public in and for the
State of Kentucky

¹The total of missed postpetition payments for this escrow loan include any missed escrow payments. Such missed escrow payments include amounts assessed for taxes and insurance and any previously assessed escrow shortage amount (if applicable). To avoid duplication, postpetition advances (if any) made for insurance, real estate taxes, or similar charges are not listed separately to the extent such advances would have been paid from the missed escrow payments. As part of the next annual RESPA analysis, movant will determine whether the escrow payments assessed to the debtor (including the missed escrow payments) result in a projected escrow shortage or overage. All rights are hereby reserved to assert or request any escrow amounts in accordance with RESPA and the total postpetition arrearage/delinquency is qualified accordingly.